

I have been an FAA certificated flight instructor for 33 years, and made my living instructing for 11 of those years. I now have a desk job, but still fly my own airplane and keep my instructor certificate current, because it is a major hassle to reacquire the certificate if I let it lapse. At this point in time, the only person who is likely to ever receive instruction from me, is my wife when she flies with me.

Nevertheless, a reading of your proposed rule indicates that I will have to register with you as I am a CFI, even though I have no intention of engaging in professional flight instruction again in my life. Your proposed rule is quite vague regarding the registration requirements - with whom am I to register, where do I register, what format is involved in this registration, must I pay a fee, and if so, how much, how much time is involved, what form(s) of identification is/are required, what form of approval is provided, how long does it take to gain approval, what form of instruction (if any) can I perform before approval, etc., etc., etc.

If I fail to register, am I subject to criminal penalties? If not, so long as I am not instructing, am I then subject to criminal penalties if I instruct my wife in my own airplane? If so, what might the penalties be? Bottom line: I am in the midst of renewing my flight instructor certificate at this time. Should I bother, or should I just give up and let it lapse?

At that, why does the TSA feel that this rule is necessary in the first place? There is already a database of certificated flight instructors available - check with the FAA, who is responsible for the issuance of flight instructor certificates! Your proposed rule is needless duplication of federal recordkeeping which is already in existence.

As you can see, there are numerous unanswered questions relating to this proposed rule. I am very uneasy about the various measures which have been taken since 9-11 which affect the average citizen, or more particularly the average pilot. It would appear that the TSA's intent is to drive all pilots from the skies, whether law abiding citizens or not, given the nature of the wording of the various rules which have come forth from TSA. Please revise this proposed rule to exempt those of us who are not employed as professional flight instructors, to show us that TSA's intent is not to do further damage to the rights and privileges of U.S. citizens.